

# PRIVACY POLICY

## FOR Pandorus

### Intelligence, LLC

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## **1. Introduction**

This Privacy Policy describes the information processing practices of Pandorus Intelligence, LLC. ("Pandorus Intelligence, LLC") on the [pandorusintelligence.com](https://pandorusintelligence.com)

website <https://www.pandorusintelligence.com> (along with all subdomains, collectively, the "Site"). This Privacy Policy is only applicable to the Site and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that may differ materially from this Privacy Policy.

NOTICE TO RESIDENTS OF CALIFORNIA, VIRGINIA, CONNECTICUT, UTAH, AND COLORADO: Additional privacy policies, specifically developed and maintained for residents of California, Virginia, Connecticut, Utah, and Colorado, are found within this Privacy Policy. If you are a resident of these states, you may have additional rights regarding our use of your personal information.

## 2. Information Collection Practices

### I. TYPES OF INFORMATION COLLECTED

We collect a number of different types of information about you (collectively, "Personal Information"):

1. **User Information.** User Information is the information we collect from you when you use our Site. User Information may include: (1) Contact Data (such as your name, phone number, and e-mail address); (2) Financial Data (such as your account or credit card number); and (3) Demographic Data (such as your zip code and age). We may also collect your User Information if you communicate with us by email, post messages to any of our chat groups, bulletin boards, or forums, or otherwise complete online forms, surveys, or contest entries.

2. **Traffic Data.** We may automatically track and collect the following categories of Traffic Data when you visit our Site: (1) Event Data, which includes: (i) Internet Protocol ("IP") address, (ii) access times, (iii) browser type and language, (iv) Internet Service Provider ("ISP"), (v) the pages you visit on our Site, (vi) the Content you view on our Site, and (vi) the URL of the page that referred you to our website; (2) domain servers; and (3) types of devices you use to access the Site. Traffic Data also includes data collected from Cookies and Web Beacons, as described in Section III below.

In addition, we collect **Publicly Available Information** from various databases, government entities, commercial data providers, and websites to create our reports and provide our Site. We collect this information from both users and non-users. While Publicly Available Information is not included in the definition of "Personal Information" for the purposes of this Privacy Policy, we do provide you with rights with respect to this information: for more details, see Your Rights and Choices below.

## II. USES OF INFORMATION COLLECTED

Your Personal Information may be used for a variety of activities, including to:

- Operate, maintain and improve the Site and its services;
- Enable you to access and use the Site;
- Send you notices, updates, security alerts and support and other messages;
- Provide and deliver the services and features you request, process and complete transactions, and send you related information, including purchase confirmations and invoices;
- Respond to your comments, questions, and requests and provide customer service and support;
- Monitor and analyze trends, usage, and activities in connection with the Site and services it provides and for marketing or advertising purposes;
- Investigate and prevent suspicious or fraudulent transactions, unauthorized use of the Site and other illegal activities;
- Personalize and improve the Site, and provide content, features, and/or advertisements that match your interests and preferences;
- Send you email notifications to update you about the Site's offerings. If you no longer wish to receive these types of communications, you may email [info@pandorusintelligence.com](mailto:info@pandorusintelligence.com) to opt out of receiving future notifications. To ensure you receive proper notifications, we collect certain information about your device such as operating system and user identification information;
- To verify your qualifications for certain products or services and to bill you for products and services;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- For testing, research, analysis, and product development; and
- For other purposes about which we notify you or are essential to the Site's functionality.

In addition, we use Publicly Available Information to provide our services to you and other users, and otherwise generally to improve and operate our Site.

## III. COOKIES AND WEB BEACONS

Cookies and web beacons are small text files that are stored on your computer when you visit certain web pages. Pandorus Intelligence, LLC collects information through cookies and web beacons about your web browsing activities such as the address of the page you are visiting, the address of the referrer page you previously visited, the time you are viewing the page, your browsing environment, and your display settings. We may use cookies and web beacons on our Site for the following purposes:

- Understanding traffic patterns and the number of visitors to the Site and other websites that we partner with;
- Understanding how you use and interact with the Site;
- Improving Pandorus Intelligence, LLC's products and services;
- Optimizing your experience on the Site;
- Providing anonymous individual or aggregate auditing, research, modeling, and reporting for our advertisers and other partners;
- Storing your password so you do not have to re-enter it each time you visit the Site;
- Providing you with relevant advertising and content; and
- Managing our Site.

Please note that cookies may be placed by a third-party service provider who performs these functions for us. These service providers may have their own privacy policies.

#### **IV. SHARING OF PERSONAL INFORMATION**

We do not share your Financial Data with third parties, though we may share Financial Data with business partners who assist us by performing core services (such as hosting, billing, fulfillment, or data storage and security) related to our operation of the Site. Those business partners agree to uphold the same standards of security and confidentiality described in this Privacy Policy, and they will only use your Financial Data to carry out their specific business obligations to Pandorus Intelligence, LLC.

We also disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates;
- Service providers;
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you; Law enforcement officers when appropriately requested in Pandorus Intelligence, LLC's discretion, and as required by applicable law, court order, or governmental regulations; and other third parties as necessary or appropriate to protect the rights, property or safety of us, our customers, or others.

Lastly, if we are involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred, your Personal Information may be shared with third parties to effectuate this activity in accordance with applicable law.

If you are a law enforcement officer seeking information from Pandorus Intelligence, LLC, about one of our users, please reference our Law Enforcement Guidelines for further information.

## **V. CONTESTS, SWEEPSTAKES, SURVEYS**

Pandorus Intelligence, LLC may conduct or co-sponsor contests, sweepstakes, or other offerings. In such circumstances, the Personal Information we obtain from you may be shared with our co-sponsor, who will be identified at the point in which you submit your information. Our co-sponsors will have the right to use your Personal Information for their own purposes, in accordance with their own privacy policies. If you do not wish for the Personal Information we obtain from you to be shared with our co-sponsors, please do not participate in these co-branded offerings.

## **VI. TESTIMONIALS**

We publish testimonials provided by our customers on our Site in addition to other endorsements. If you provide a testimonial, we may publish it on our Site using your first name and last initial.

## **3. Confidentiality and Security of Personal Information**

### **I. USER ABILITY TO DOWNLOAD/SUPPRESS PUBLICLY AVAILABLE INFORMATION**

Pandorus Intelligence, LLC gathers information from publicly available open sources and is not the originator of information found in its reports. To request your information be excluded from third party websites and databases, please contact those parties separately. You may also consult the FBI's Digital Exhaust Opt Out Guide.

### **4. Third-Party Sites**

The Site may contain links to websites not operated by Pandorus Intelligence, LLC. We are not responsible for the privacy practices or the content of such websites. Please review the privacy policies of each site you visit. We may also make chat rooms, forums, message boards, and news groups available to you. Please understand that any information that is disclosed in these areas becomes accessible to the public. You should exercise caution when deciding to disclose any information about yourself or others in a public forum.

### **5. Updates and Changes to Privacy Policy**

We may update or modify this Privacy Policy by posting such update or modification on the Site, or by other means as required under applicable law. Any such change, update, or modification will be effective immediately upon posting on the Site. If you do not agree to the new changes, please stop using the Site.

## **6. Children’s Information**

The Site is not directed to children under 13 (or other age as required for data processing under applicable law), and we do not knowingly collect Personal Information from children. If you are a parent or guardian and believe your child has uploaded Personal Information to our site without your consent, you may contact us as described in Contact Information below. If we become aware that a child has provided us with Personal Information in violation of applicable law, we will delete any Personal Information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account if applicable.

## **8. Additional Information for Residents of California, Virginia, Connecticut, Utah, and Colorado**

### **I. PERSONAL INFORMATION WE COLLECT AND SHARE**

The information Pandorus Intelligence, LLC has collected within the last twelve (12) months about you are described in the table below. (Note that the table below also includes our disclosures of Publicly Available Information, even though such information is technically not considered Personal Information under most US state laws).

<b>Category of Personal Information Collected by Pandorus Intelligence, LLC</b>	<b>Category of Third Parties Personal Information is Disclosed to for a Business Purpose</b>	<b>Category of Third Parties to Whom Personal Information is Sold And/or Shared</b>
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**A. Identifiers.** A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.

Service providers,  
Other users who  
request this  
information, Data  
analytics providers

Referral  
Affiliates  
(defined  
below), Data  
analytics  
providers

**B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** A name, address, telephone number, education, employment, employment history, credit card number, debit card number, or any other financial information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.

Service providers,  
Other users who  
request this  
information  
(excluding credit  
card, debit card,  
and other financial  
information), Data  
analytics providers

Data analytics  
providers

**C. Protected classification characteristics under California or federal law.** Age (40 years or older), national origin, citizenship, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.

Service providers,  
Other users who  
request this  
information, Data  
analytics providers

Data analytics  
providers

**D. Commercial information.** Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Service providers,  
Other users who request this information, Data analytics providers,

Data analytics providers,

**E. Internet or other electronic network activity.** Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.

Service providers,  
Data analytics providers,

Data analytics providers,

**F. Sensory data.** Audio, electronic, visual, or similar information.

Service providers,  
Other users who request this information, Data analytics providers

Data analytics providers

**G. Professional or employment-related information.** Current or past job history.

Service providers,  
Other users who request this information, Data analytics providers

Data analytics providers

**H. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99)).** Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as class lists or student identification codes.

Service providers,  
Other users who request this information, Data analytics providers

Data analytics providers



**I. Inferences drawn from other personal information to create a profile about a consumer.** Profile reflecting a consumer's preferences.

Service providers,  
Data analytics  
providers,

Data analytics  
providers,

## II. USE OF PERSONAL INFORMATION

We may use or disclose the Personal Information we collect for the purposes outlined in Use of Information above. Pandorus Intelligence, LLC will not collect additional categories of Personal Information or use the Personal Information we have collected for materially different, unrelated, or incompatible purposes without providing notice.

## III. YOUR RIGHTS AND CHOICES

Subject to applicable law, if you are a resident of California, Virginia, Connecticut, Utah, or Colorado, you may have the following rights:

- **To Know and Access:** to obtain a copy of the specific pieces of Personal Information we have collected about you. (Note that this right only applies to Personal Information relating to you, and not to any other user.)
- **Correction:** to request the correction of inaccurate Personal Information that we may have on file about you.
- **Obtain additional details regarding Pandorus Intelligence, LLC's** information practices: You may have the right to request disclosures regarding Pandorus Intelligence, LLC's information practices. (Note that this information is generally available in this Privacy Policy).

We will not discriminate against you, in terms of price or services that we offer, if you exercise any of the rights listed above.

*Verification and Appeal Process:* We are required by law to take reasonable steps to verify your identity prior to responding to your request. Please note that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). If we are unable to process your request via you authenticating yourself on the Site, we may verify your request by asking for information sufficient to confirm your identity, such as your name, email address, and phone number. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and as permitted by applicable law. Where required by applicable

law, we will notify you if we reject your request, and notify you of the reasons we are unable to honor your request.

If you are a resident of Colorado, Virginia, or Connecticut, you have the right to appeal a request we deny when we have verified your identity and still decline to honor your request. The process for that appeal will be sent to you separately if your request is denied.

*Authorized Agent:* Depending on where you live, you may have the right to use an authorized agent on your behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a user to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the user. If you are an authorized agent trying to exercise rights on behalf of a Pandorus Intelligence, LLC user, then you can make a request on the user's behalf by contacting us as set forth below in the "Contact Information" section. Such requests must include a written authorization from the consumer that includes the consumer's full name, address, telephone number and valid email address used by the consumer to interact with Pandorus Intelligence, LLC that is signed by the consumer and clearly bestows upon the agent the proper authority. Alternatively, an acting agent can provide a valid power of attorney signed by the consumer on the agent's behalf and a valid email address used by the consumer to interact with Pandorus Intelligence, LLC. In addition, for a request under the Right to Know, Right to Delete, or Right to Correct, the email address of the consumer will be used to separately verify the agent's authority directly with the consumer.

*Refer-a-Friend, Promotions, and Similar Incentive Programs:* We may offer referral programs, promotions such as sweepstakes, or other incentivized information collection programs. We may offer incentives to you such as discounts or promotional items or credit in connection with these programs, wherein you provide Personal Information regarding your friends or colleagues (such as their email address) and receive rewards when they sign up to use our Site. (The referred party may also receive rewards for signing up via your referral.) Alternatively, we may ask you to provide your Personal Information in exchange for a reward or participation in a promotion. These programs are entirely voluntary and allow us to grow our business and provide additional benefits to you. The value of your information to us depends on how you ultimately use our Site, whereas the value of the referred party's information to us depends on whether the referred party ultimately uses our Site. Said value will be reflected in the incentive offered in connection with each program. You may withdraw from the incentives at any time. In order to withdraw from the financial incentive, please contact us as described below.

*Shine the Light Disclosure:* California residents are entitled to ask us for a notice that identifies the categories of Personal Information that we share with our affiliates and/or third parties for marketing purposes, and provides contact information for such affiliates and/or third parties. If you are a California resident and would like this information, please submit a written request to us using the contact information below.

## **9. CONTACT INFORMATION**

If you have any questions or comments about this Privacy Policy, the ways in which Pandorus Intelligence, LLC collects and uses your information described herein, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

- Website: [www.pandorusintelligence.com](http://www.pandorusintelligence.com)
- Email: [info@pandorusintelligence.com](mailto:info@pandorusintelligence.com)
- Postal Address: 4445 Corporation Lane, Suite 264, Virginia Beach, VA 23462